

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

DR. RICARDO VASQUEZ,)	
)	
Plaintiff,)	
)	
v.)	
)	Case No. 1:21-cv-01693-JRS-MG
INDIANA UNIVERSITY HEALTH, INC.,)	
INDIANA UNIVERSITY HEALTH)	
BLOOMINGTON, INC., d/b/a)	
IU HEALTH BLOOMINGTON)	
HOSPITAL, and DR. DANIEL HANDEL)	
)	
Defendants.)	

JOINT STIPULATION AND MOTION TO DISMISS ACTION WITH PREJUDICE

Pursuant to the Court's Order Directing Filing of Documents Authorizing Dismissal (ECF No. 332), the parties jointly submit the attached Joint Stipulation and Proposed Order Dismissing Action. As the parties previously advised the Court, they have privately settled all of their disputes in this case. By their settlement, Defendants agreed, *inter alia*, to withdraw their pending motion for attorney's fees (ECF No. 301) in exchange for Plaintiff's payment of \$100,000 of the attorney's fees, and they further agreed to withdraw their pending bill of costs (ECF No. 306) in exchange for Plaintiff's payment of \$76,030.10 to pay all of their claimed costs. Defendants now confirm that Plaintiff timely paid these sums in accordance with the parties' settlement agreement. The parties therefore bring the present motion to give effect to their settlement agreement, and ask that the Court dismiss as moot Defendants' motion for attorney's fees (ECF No. 301) and bill of costs (ECF No. 306) in accordance with the parties' settlement agreement, and dismiss this entire action with prejudice.

Dated: October 2, 2024

/s/ William Markham

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Respectfully submitted,

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Bloomington Hospital, and Dr. Daniel
Handel*

CERTIFICATE OF SERVICE

I certify that on October 2, 2024 a copy of the foregoing was filed electronically through the Court's CM/ECF system. Service of this filing will be made on all registered counsel.

/s/ Brian K. Grube

Brian K. Grube